

**HOFLAND & TOMSHECK**

Jason F. Carr, Esq.  
Nevada State Bar No. 6587  
josht@hoflandlaw.com  
228 South Fourth Street, 1<sup>st</sup> Floor  
Las Vegas, Nevada 89101  
Telephone: (702) 895-6760  
Facsimile: (702) 731-6910

Appointed counsel for **Marcus Antonio Zamudio-Orozco**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCUS ANTONIO ZAMUDIO-OROZCO,

Defendant.

Case No. 2:23-cr-00058-JCM-VCF

**STIPULATION TO CONTINUE  
SENTENCING  
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Edward G. Veronda, Assistant United States Attorney, counsel for the United States of America, and Jason F. Carr, Esq., CJA appointed counsel for Marcus Antonio Zamudio-Orozco, that the sentencing set for June 10, 2024, at 10:00 a.m. be vacated and set to a date and time convenient to this Court, but no sooner than thirty (30) days.

The Stipulation is entered into for the following reasons:

1. This is the first stipulation of the sentencing date.
2. That defendant Zamudio requests additional time to research a relatively complex sentencing issue and to complete other matters attendant to the sentencing such as ensuring related state court charges are dismissed.

1           3. That defense counsel has consulted with Mr. Zamudio about moving his  
2           sentencing proceeding. Mr. Zamudio does not object and, in fact, specifically  
3           requested that counsel move the sentencing proceeding.

4           4. The additional time requested herein is not sought for purposes of delay, but to  
5           allow counsel for defendant sufficient time within which to be able to adequately  
6           prepare for sentencing.

7           This is the first stipulation to continue the sentencing filed herein.

8  
9           DATED this 30th Day of May, 2024.

10          HOFLAND AND TOMSHECK

JASON M. FRIERSON  
United States Attorney

11  
12          /s/ Jason F. Carr  
13          By: \_\_\_\_\_  
14          JASON F. CARR, ESQ.  
CJA Counsel Zamudio-Orozco

15  
16          /s/ Edward G. Veronda  
17          By: \_\_\_\_\_  
18          EDWARD G. VERONDA  
19          Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4

5 Plaintiff,

6 v.

7 MARCUS ANTONIO ZAMUDIO-OROZCO,  
8

9 Defendant.

Case No. 2:23-cr-00058-JCM-VCF

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER**

**FINDINGS OF FACT**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
11 Court finds that:

- 12 1. This is the first stipulation of the sentencing date.
- 13 2. That, defendant Zamudio requests additional time to research a relatively  
14 complex sentencing issue and to complete other matters attendant to the  
15 sentencing such as ensuring related state court charges are dismissed.
- 16 3. That defense counsel has consulted with Mr. Zamudio about moving his  
17 sentencing proceeding. Mr. Zamudio does not object and, in fact, specifically  
18 requested that counsel move the sentencing proceeding.
- 19 4. The additional time requested herein is not sought for purposes of delay, but to  
20 allow counsel for defendant sufficient time within which to be able to adequately  
21 prepare for sentencing.

22 This is the first stipulation to continue the sentencing filed herein.

**CONCLUSIONS OF LAW**

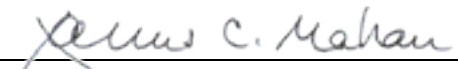
24 The ends of justice served by granting said continuance outweigh the best interest of the  
25 public and the defendant in a speedy trial, since the failure to grant said continuance would be  
26 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the

1 opportunity within which to be able to effectively and thoroughly prepare for trial, taking into  
2 account the exercise of due diligence.

3 **ORDER**

4 IT IS THEREFORE ORDERED that the sentencing currently scheduled for  
5 June 10, 2024, at the hour of 10:00 a.m., be vacated and continued to **July 12, 2024 at 10:00**  
6 **a.m.**

7 DATED May 31, 2024.

8  
9   
10 UNITED STATES DISTRICT JUDGE